



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF THE  
REGIONAL ADMINISTRATOR

January 19, 2012

Amy Jackson-Grove  
Division Administrator FHWA  
628-2 Hebron Avenue, Suite 303  
Glastonbury, Connecticut 06033

Re: Final Environmental Impact Statement North Hillside Road Extension Mansfield,  
Connecticut (CEQ #20110425)

Dear Ms. Jackson-Grove:

The Environmental Protection Agency-New England Region (EPA) has reviewed the Federal Highway Administration's (FHWA)/Connecticut Department of Transportation's (CTDOT) Final Environmental Impact Statement (FEIS) for the North Hillside Road Extension project in Mansfield, Connecticut. We submit the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes the proposed extension of the North Hillside Road on the UConn Storrs Campus to the north to connect with Route 44 in Mansfield, Connecticut. The 3400-foot extension is proposed as a two-lane 32-foot-wide road intended to relieve local traffic, provide an alternate entrance to the UConn campus, and provide access to the proposed North Campus development area. Funding for the project would be provided in part by a \$6.1 million federal appropriation to be administered by CTDOT.

EPA's comments on the DEIS highlighted our concerns related to wetlands, air quality and secondary/cumulative impacts for consideration as the FEIS was developed for the proposed project. The FEIS addresses many of our DEIS comments but we continue to encourage FHWA and CTDOT to refine the project design and proposed mitigation to avoid environmental impacts related to stormwater runoff and wetlands. Our specific recommendations follow.

Stormwater Management

Our comments on the DEIS highlighted the Eagleville Brook watershed--the focus of the first impervious cover, stormwater Total Maximum Daily Load (TMDL) analysis in the United States. This first of its kind TMDL has become a model for other states' efforts in addressing stormwater in a TMDL, and we believe it should serve as the model for how activities in the project area watershed should be implemented. Our DEIS comments specifically recommended significant use of pervious pavement for new development areas (such as parking spaces) and

explained that this cost effective best management practice (BMP) has been extensively studied and its effectiveness documented in New England by the University of New Hampshire's (UNH) Stormwater Center. The FEIS notes that, "UConn will consider the use of pervious pavement..." and states that the FEIS has been revised "to reflect the potential use of pervious pavement...." While this is helpful, we continue to believe that a more committed approach is warranted. We believe FHWA/CTDOT/UConn should develop and implement requirements for this specific BMP for parking lots.

Further, the FEIS does not fully explore the question we posed in comments on the DEIS regarding the need for 3.5 parking spaces per 1,000 square feet of building floor space. The FEIS asserts that the Town of Mansfield requires a minimum parking ratio of 4 spaces per 1,000 square feet of building floor space for the types of uses proposed for the North Campus, but that UConn is proposing just 3.5 spaces to reduce the development footprint and amount of impervious cover. While this reduction is a step in the right direction, the FEIS does not contain an assessment of whether these types of uses -- if located on a shuttle-served college campus instead of elsewhere in a community -- require the proposed 3.5 parking spaces or if fewer would suffice. As we indicated in our comments on the DEIS, even a reduction to 3 spaces per 1,000 square feet of building floor space would lessen the number of parking spaces considerably. This issue is important since impervious cover not only can generate stormwater runoff but excess parking can lead to increased vehicle trips, resulting in greater greenhouse gas emissions. Before UConn enters the next stage of design and permitting, we strongly recommend it calculate how many spaces are actually needed, using reasonable assumptions about what percentage of the trips to North Campus will be on foot, bicycle, or shuttle. As we said before, some of the best research on the subject of parking requirements has been done by UConn's Connecticut Transportation Institute and we highly recommend consulting experts on that faculty.

In addition, we support the work at UConn (mentioned in the FEIS) to develop a sustainable development policy that would address pervious pavement and other LID measures. At a minimum, all planned and future infrastructure expansion should commit to using pervious pavement wherever feasible and unless it can be definitively demonstrated that it is impracticable. We recommend that these mitigation requirements be incorporated in the FHWA Record of Decision (ROD) to guide future infrastructure development on the North Campus. Our comments on the DEIS requested a meeting to discuss stormwater management issues in greater detail. To my knowledge, such a meeting never occurred. EPA continues to be willing to coordinate with FHWA, CTDOT and UConn regarding stormwater management related to the project and potential secondary development.

### Wetland Issues

We note that the most recent Clean Water Act (CWA) Section 404 application to the U.S. Army Corps of Engineers was withdrawn by the applicant on June 22, 2009, and that no subsequent revised application has been submitted. A complete CWA Section 404 application must be submitted and reviewed prior to the determination of the Least Environmentally Damaging Practicable Alternative (LEDPA) and approval of proposed compensatory mitigation. Additional information may be required while the CWA Section 404 permit review process is



conducted. In general, EPA continues to support the avoidance and preservation approach to mitigation described in the FEIS and will continue to participate in the development and review of the mitigation plans as they progress through the CWA Section 404 process. As part of future mitigation discussions we will likely recommend that an additional parcel of land with a vernal pool and forested wetlands--which serves as a wildlife corridor--be preserved along with the larger conservation area.

Thank you for the opportunity to review the FEIS for the North Hillside Road Extension project. Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,



H. Curtis Spalding  
Regional Administrator

cc:

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